

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

DIANE ERDMANN,

Debtor.

No. 19-41238

OBJECTION TO EXEMPTIONS

Kathryn A. Ellis, the Chapter 7 Trustee herein, hereby objects to the exemptions of the debtor as described below:

1. To the extent that the debtor is attempting to claim an exemption in excess of the value permitted by federal or state law, the Trustee objects to the assertion of such an exemption, including but not limited to the debtor's claim of nine exemptions, each in the amount of "100% of fair market value", where no exemption statute was stated for any of the exemptions but also where the applicable exemption statutes are limited in amounts;

2. To the extent that the debtor is attempting to claim an exemption for property for which no exemption is permitted under federal or state law, the Trustee objects to the assertion of such an exemption, including but not limited to the debtor's claim of nine exemptions pursuant to 11 U.S.C. § 522 (b)(2) when that statute is not an exemption, but merely the statute that authorizes the debtor to claim federal bankruptcy exemptions;

3. To the extent that the debtor does not describe an asset or other item of property for which an exemption is claimed with particularity, the Trustee objects to the assertion of such an exemption;

**OBJECTION TO EXEMPTIONS - 1**

KATHRYN A. ELLIS PLLC  
5506 6<sup>th</sup> Ave S  
Suite 207  
Seattle, WA 98108  
(206) 682-5002

4. To the extent that the actual value of an asset exceeds the valuation of the asset by the debtor, the Trustee objects to the claim of any exemption; and

5. To the extent that the debtor has not provided information and/or documentation to the Trustee and/or have failed to cooperate with the Trustee regarding the investigation of her financial affairs and/or concealed any property, the Trustee objects to any claims of exemption by the debtor.

The Trustee is objecting, in part, to preserve her rights to object pending receipt of more information about the debtor's assets. The Trustee reserves the right to assert any other basis for her objection or otherwise amend this objection as she may determine to be appropriate at a later date.

DATED this 27<sup>th</sup> day of June, 2019.

By: /s/ Kathryn A. Ellis

Kathryn A. Ellis, Trustee

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## OBJECTION TO EXEMPTIONS - 2

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